EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE TRICOR DIRECT PURCHASER ANTITRUST LITIGATION	C.A. No. 05-340 (KAJ) (Consolidated)
THIS DOCUMENT RELATES TO: ALL ACTIONS	
IN RE TRICOR INDIRECT PURCHASER ANTITRUST LITIGATION	C.A. No. 05-360 (KAJ) (Consolidated)
THIS DOCUMENT RELATES TO: ALL ACTIONS	

Direct and Indirect Purchaser Plaintiffs' Federal Rule of Civil Procedure 30(b)(6) Notice of Video-Tape Deposition of Novopharm, Ltd., Teva Pharmaceuticals USA, Inc. and Teva Pharmaceutical Industries Ltd.

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition by oral examination of Novopharm Ltd., Teva Pharmaceuticals USA, Inc., and Teva Pharmaceutical Industries Ltd., on September 25, 2006, at Rosenthal, Monhait & Goddess, P.A. 919 Market Street, Suite 1401, Wilmington, DE 19801, or such other location agreed to by counsel. The deposition will be recorded by videotape as well as stenographically before a Notary Public or other officer authorized to administer oaths, and shall continue from day to day until completed, with such adjournments as to time and place as may be necessary.

NOTICE IS HEREBY GIVEN that, pursuant to Fed. R. Civ. P. 30(b)(6), Novopharm, Ltd., Teva Pharmaceuticals USA, Inc. and Teva Pharmaceutical Industries Ltd., are required to designate one or more officers, directors or managing agents, or other persons who consent to testify on their behalf and to give testimony on the topics set forth in Exhibit A hereto, and the person so designated shall be required to testify as to the matters known or reasonably available to the corporation with respect to each topic. You are invited to attend and cross examine.

Dated: September 7, 2006

Respectfully submitted,

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DEFINITIONS AND INSTRUCTIONS

1. The term "Novopharm" means Novopharm, Ltd., including all of its parents, subsidiaries, affiliates, divisions, predecessors, successors, and assigns, as well as all officers, directors, employees, agents, consultants, attorneys and all other persons acting or purporting to act on behalf of, or under the control of, Novopharm Ltd.

2. The term "Teva" means Teva Pharmaceuticals, USA Inc., and Teva Pharmaceutical Industries, Ltd., including all of its parents, subsidiaries, affiliates, divisions, predecessors, successors and assigns (including, but not limited to GATE Pharmaceuticals), as well as officers, directors, employees, agents, consultants, attorneys and all other persons acting or purporting to act on behalf of, or under the control of, Teva Pharmaceuticals, USA Inc., and Teva Pharmaceutical Industries, Ltd.

3. The term "Abbott" means Abbott Laboratories including all of its Abbott Laboratories. parents, subsidiaries, affiliates, divisions, predecessors, successors, and assigns, as well as all officers, directors, employees, agents, consultants, attorneys and all other persons acting or purporting to act on behalf of, or under the control of, Abbott Laboratories.

4. The term "Fournier" means Fournier Industrie et Sante, and/or Laboratories Fournier S.A., including all of its parents, subsidiaries, affiliates, divisions, predecessors, successors, and assigns, as well as all officers, directors, employees, agents, consultants, attorneys and all other persons acting or purporting to act on behalf of, or under the control of, Fournier Industrie et Sante, and/or Laboratories Fournier S.A.

5. The term "Teva ANDA's" means Abbreviated New Drug Application Nos. 75-753 and 76-433.

6. The term "Teva ANDA Products" means any products, whether preliminary or final, manufactured according to the Teva ANDA's.

7. The term "TriCor" means any pharmaceutical product marketed under the trade name "TriCor®," at any time.

8. The term "Lofibra" means any pharmaceutical product marketed in the United States under the trade name "Lofibra®," at any time

9. The term "Generic TriCor" means any prescription drug preparation containing fenofibrate as its sole active ingredient marketed in the United States by or on behalf of Novopharm or Teva under ANDA Nos. 75-753 or 76-433, regardless of trade name.

10. The term "fenofibrate" means any prescription drug preparation containing fenofibrate as its sole active ingredient marketed in the United States.

11. "Formulary" means the comprehensive list(s) of brand name and generic drugs covered under a prescription benefit or other health, welfare or medical plan.

12. "Managed Care Organization" or "MCO" means a type of entity or organization providing managed health care (including prescription benefit services) such as a health maintenance organization (HMO), health care service contractor (HCSC), preferred provider organization (PPO) or similar entity.

13. The term "document" is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a). A draft or non-identical copy is a separate document within the meaning of this term.

EXHIBIT A

Novopharm Ltd., Teva Pharmaceuticals USA, Inc. and Teva Pharmaceutical Industries Ltd., are requested to designate one or more officers, directors or managing agents, or other persons who consent to testify on its behalf who have knowledge of the matters set forth herein.

TOPICS

1. Teva's identification, development, and regulatory approval of its Generic TriCor.
2. Teva's projected and actual scale up, validation, and manufacturing of commercial quantities of its Generic TriCor, including its ability to fill projected and actual market demand.
3. Teva's sales and marketing of Generic TriCor, including the dates on which sales commenced and the marketing strategies considered and employed.
4. The impact of Abbott and Fournier's actions at issue in this litigation on Teva's development, regulatory approval, manufacturing, marketing and sales of its Generic TriCor.
5. The details and timing regarding any information provided by Teva to Abbott and/or Fournier relating to Teva ANDA Nos. 75-753 and 75-433.
6. The details and timing regarding any provision of Teva's Generic TriCor products by Teva to Abbott and/or Fournier for any purpose, including for purposes of allowing Abbott and/or Fournier to examine or test Teva's Generic TriCor products.
7. Any communications between Teva and Abbott/Fournier relating to the provision of information and/or samples by Teva regarding Teva's Generic TriCor products.
8. Teva's decision to market its Generic TriCor product(s) as a branded product(s).

9. The pricing of your Generic TriCor products including, without limitation, any actual, published, potential, or expected prices or other terms for the sale of any of your fenofibrate products to any customer, category of customer, or class of trade, including discounts, rebates, chargebacks, and/or other adjustments to price or quantity and the basis on which same are calculated or determined.

10. Projected or actual effects and/or impact of the entry of any of your Generic TriCor products on: (a) prices charged for Abbott's branded TriCor products; and (b) prices and/or volumes of drugs prescribed for the same uses as TriCor and/or other fenofibrates.

11. Manuals, matrices, policies, guidelines and/or formulas developed to calculate, figure, or otherwise determine price and/or adjustments to the price (or quantity) of your Genric TriCor products for each customer, class of trade, market segment, and/or subgroup thereof.

12. Contracts with wholesalers, pharmacies, and managed care organizations for the sale of your Generic TriCor products.

13. Process(es), method(s), strategies, and/or procedures that you proposed, considered or used for setting or establishing the prices (whether direct or contract, and including rebates, discounts, and/or chargebacks) for any of your Generic TriCor products, whether branded or generic.

14. Actual and or forecasted effects of the market entry and/or delayed market entry of any of your Generic TriCor products on the unit and dollar sales and market share of (a) any TriCor product or products; (b) any fenofibrate product, including your own; and (c) drugs prescribed for the same uses as TriCor and/or other fenofibrates.

15. The impact of selling your Generic TriCor product as a branded product as opposed to a generic on price, costs (including marketing and other associated costs), and sales (in volume and dollars).

16. Pre- and post-market entry marketing and sales strategies regarding your Generic TriCor products.

CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2006 I electronically filed the foregoing document using CM/ECF, which will send notification of such filing to all registered participants, including:

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE TRICOR DIRECT PURCHASER ANTITRUST LITIGATION	C. A. No. 05-340 (KAJ) (Consolidated)
THIS DOCUMENT RELATES TO: ALL ACTIONS	
IN RE TRICOR INDIRECT PURCHASER ANTITRUST LITIGATION	C.A. No. 05-360 (KAJ) (Consolidated)
THIS DOCUMENT RELATES TO: ALL ACTIONS	

Direct and Indirect Purchaser Plaintiffs' Federal Rule of Civil Procedure 30(b)(6) Notice of Video-Tape Deposition of Impax Laboratories

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition by oral examination of Impax Laboratories on September 26, 2006, at Rosenthal, Monhait & Goddess, P.A., 919 Market Street, Suite 1401, Wilmington, DE 19801, or on such other date and at such other location as agreed to by counsel. The deposition will be recorded by videotape as well as stenographically before a Notary Public or other officer authorized to administer oaths, and shall continue from day to day until completed, with such adjournments as to time and place as may be necessary.

NOTICE IS HEREBY GIVEN that, pursuant to Fed. R. Civ. P. 30(b)(6), Impax Laboratories, is required to designate one or more officers, directors or managing agents, or other persons who consent to testify on their behalf and to give testimony on the topics set forth in

Exhibit A hereto, and the person so designated shall be required to testify as to the matters known or reasonably available to the corporation with respect to each topic. You are invited to attend and cross examine.

Dated: September 7, 2006

Respectfully submitted,

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DEFINITIONS

1. The term "Impax" means Impax Laboratories Inc., including all of its parents, subsidiaries, affiliates, divisions, predecessors, successors, and assigns, as well as all officers, directors, employees, agents, consultants, attorneys and all other persons acting or purporting to act on behalf of, or under the control of, Impax Laboratories Inc.

2. The term "Abbott" means Abbott Laboratories including all of its parents, subsidiaries, affiliates, divisions, predecessors, successors, and assigns, as well as all officers, directors, employees, agents, consultants, attorneys and all other persons acting or purporting to act on behalf of, or under the control of Abbott Laboratories.

3. The term "Fournier" means Fournier Industrie et Sante, and/or Laboratories Fournier S.A., including all of its parents, subsidiaries, affiliates, divisions, predecessors, successors, and assigns, as well as all officers, directors, employees, agents, consultants, attorneys and all other persons acting or purporting to act on behalf of, or under the control of, Fournier Industrie et Sante, and/or Laboratories Fournier S.A.

4. The term "Impax ANDA's" means Abbreviated New Drug Application Nos. 75-868 and 76-509.

5. The term "TriCor" means any pharmaceutical product marketed under the trade name "TriCor®," at any time.

6. The term "Generic TriCor" means any prescription drug preparation containing fenofibrate as its sole active ingredient identified, developed, validated and/or approved for marketing in the United States by or on behalf Impax under ANDA Nos. 75-868 or 76-509, regardless of projected or actual tradename.

7. "Formulary" means the comprehensive list(s) of brand name and generic drugs covered under a prescription benefit or other health, welfare or medical plans.

8. "Managed Care Organization" or "MCO" means a type of entity or organization providing managed health care (including prescription benefit services) such as a health maintenance organization (HMO), health care service contractor (HCSC), preferred provider organization (PPO) or similar entity.

9. The term "document" is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a). A draft or non-identical copy is a separate document within the meaning of this term.

EXHIBIT A

Impax Laboratories is requested to designate one or more officers, directors or managing agents, or other persons who consent to testify on its behalf who have knowledge of the matters set forth herein.

TOPICS

1. Impax's identification, development, and regulatory approval of its Generic TriCor.
2. Impax's projected scale up, validation, and manufacturing of commercial quantities of its Generic TriCor, including its ability to fill projected market demand.
3. The impact of Abbott and Fournier's actions at issue in this litigation on Impax's development, regulatory approval, manufacturing, marketing and sales of its Generic TriCor.
4. Impax's decision not to market its Generic TriCor.
5. The details and timing regarding any information provided by Impax to Abbott and/or Fournier relating to the Impax ANDAs and/or Impax Generic TriCor products .
6. The details and timing regarding any provision of Impax Generic TriCor products to Abbott and/or Fournier for any purpose, including for purposes of allowing Abbott and/or Fournier to examine or test said Generic TriCor products.
7. Any communications between Impax and Abbott/Fournier relating to the provisions of information and/or samples by Impax regarding Impax ANDA's Nos. 75-868 or 76-509.
8. Impax's decision regarding submission of an ANDA for a generic version of the TriCor tablet product approved pursuant to NDA No. 21-656.

9. Process (es), method(s), strategies, and/or procedures that Impax proposed or considered for setting or establishing the prices (whether direct or contract, and including rebates, discounts, and/or chargebacks) for Generic TriCor.

CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2006 I electronically filed the foregoing document using CM/ECF, which will send notification of such filing to all registered participants, including:

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